

REMARKS

This Final Amendment is being filed in response to the Final Office Action mailed on December 27, 2011, which has been reviewed and carefully considered. By means of the present amendment, independent the claims have been amended for better clarity. Entry of the present amendment and allowance of the present application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 13-32 are pending in the application, where claims 13 and 25 are independent.

In the Final Office Action, the Examiner objected to claims 13 and 25 for a certain informality. In response, claims 13 and 25 have been amended to remove the noted informality. Accordingly, it is respectfully submitted that the objection to claims 13 and 25 has been overcome and withdrawal of this objection is respectfully requested.

In the Final Office Action, specification is objected to for allegedly failing to provide antecedent basis for a certain feature of claims 13 and 25, namely, a further directory different from the content directory for storing removed information. This objection is respectfully traversed. However, without agreeing with the position forwarded in the Office Action and in the interest of advancing prosecution, claims 13 and 25 have been amended to delete the further directory.

In the Final Office Action, claims 13 and 25 are rejected under 35 U.S.C. §112, first paragraph. This rejection is respectfully traversed. However, without agreeing with the

position forwarded in the Office Action and in the interest of advancing prosecution, claims 13 and 25 have been amended to better conform to 35 U.S.C. §112, first paragraph. Accordingly, it is respectfully submitted that claims 13 and 25 are now in proper form and it is respectfully requested that this rejection under 35 U.S.C. §112, first paragraph be withdrawn.

In the Final Office Action, claims 13, 15, 17, 19 and 22-27 are rejected under 35 U.S.C. §103(a) over U.S. Patent Application Publication No. 2003/0074473 (Pham) in view of U.S. Patent No. 6,065,055 (Hughes) and U.S. Patent Application Publication No. 2003/0009484 (Hamanaka). Further, claims 28 and 31 are ejected under 35 U.S.C. §103(a) over Pham, Hughes and Hamanaka in view of U.S. Patent No. 5,835,700 (Carbonneau). Claim 29 is ejected under 35 U.S.C. §103(a) over Pham, Hughes and Hamanaka in view of U.S. Patent Application Publication No. 2005/0193060 (Barton). Claims 14, 30 and 32 are ejected under 35 U.S.C. §103(a) over Pham, Hughes and Hamanaka in view of U.S. Patent Application Publication No. 2003/0023671 (Abdulrahiman). Claim 16 is rejected under 35 U.S.C. §103(a) over Pham, Hughes and Hamanaka in view of U.S. Patent Application Publication No. 2003/0126086 (Safadi). Claims 18 and 20 are rejected under 35 U.S.C. §103(a) over Pham, Hughes and Hamanaka in view of U.S. Patent Application Publication No. 2002/0143780 (Gorman). Claim 21 is rejected under 35 U.S.C. §103(a) over Pham, Hughes and Hamanaka in view of U.S. Patent Application Publication No. 2004/0193609 (Phan). These rejections are respectfully traversed. It is respectfully submitted that the claims are patentable over

Pham, Hughes, Hamanaka, Carbonneau, Barton Abdulrahiman, Safadi, Gorman and Phan for at least the following reasons.

Pham is directed to a scalable network gateway processor architecture where SA parameters are associated with network data packets, as described in paragraph [0043], lines 14-15. It is alleged on page 5 of the Final Office Action, that paragraph [0050], lines 1-19 of Pham discloses or suggests "storing, in a content directory, the filtered information devoid of information describing characteristics of content that cannot be rendered by any of said plurality of network rendering devices; [and] storing removed information removed by the periodically filtering act," as recited in independent claim 13, and similarly recited in independent claim 25. This allegation is respectfully traversed. In particular, paragraph [0050] of Pham specifically recites (emphasis added):

Finally, an array of high-speed memory 100 is provided to satisfy the external memory and program storage requirements of the network processor 92. Included within this memory 100 is a data table 102 providing a dynamic data store for accumulated routing and filtering information. For implementations of the ingress processor 80 utilized in preferred embodiments of the present invention, the data table 102 also stores network connection SA parameter data. The route and filtering data are accumulated in a conventional manner from inspection of the attached interfaces and the source addresses of data packets received through the interfaces. The SA parameter data is explicitly provided and, as appropriate, modified and deleted by the control processor 84 in response to the creation, maintenance, and dropping of IPsec connections that are routed through the VPN gateway 72. Preferably, the SA parameter data is used by the ingress processor 80 to dynamically create and attach SA headers to each received IPsec data packet. Thus, in accordance with the preferred embodiment of the present invention, each IPsec data packet transferred to a crypto processor 86 is packaged with all of the necessary SA information needed for IPsec protocol processing.

Pham, also recites in paragraph [0070], lines 1-12 (emphasis added):

Where an applicable connection route or SA parameter context is not found in the data table 102, indicating that the network data packet received corresponds to an implied new connection request, the data packet is forwarded 258 through the control path to the control processor 84 for negotiation of an IPsec connection. The negotiation is conducted through the appropriate network connected ingress and egress processors 80, 82, effectively operating as simple network interfaces, to establish the IPsec connection 260 and mutually determine and authenticate the SA parameters for the connection 262.

"The encrypted packet 318 is then decrypted 358 utilizing the SA parameters provided by the SA header 334." (Pham, paragraph [0076], lines 7-9) Thus, any filtering in Pham is form maintaining SA parameters, where the SA parameters are related to routes and connections and/or used for decryption. That is, the SA parameters are not to content that cannot be rendered, and the stored Pham accumulated routing and filtering information is not any "filtered information devoid of information describing characteristics of content that cannot be rendered by any of said plurality of network rendering devices,' or any" removed information removed by the periodically filtering act," as recited in independent claim 13, and similarly recited in independent claim 25.

Even assuming, arguendo, that somehow Pham discloses or suggests "storing, in a content directory, the filtered information devoid of information describing characteristics of content that cannot be rendered by any of said plurality of network rendering devices; [and] storing removed information removed by the periodically filtering act", there is still no disclosure or suggestion in Pham of the present invention as recited in independent claim 13, and similarly recited in independent claim 25 which, amongst other patentable

elements, recites (illustrative emphasis provided):

searching the **removed** information describing characteristics of content that cannot be rendered by any of the plurality of network rendering devices.

At best, Pham merely discloses storing filtered information, and is completely silent and does not disclose or suggest to also store the removed information, which is most likely discarded as is typically done with removed information. Pham does not even disclose or suggest storing any removed information, removed by periodically filtering, let alone disclosing or suggesting searching the removed information that describe characteristics of content that cannot be rendered by any of the plurality of network rendering devices, as recited in independent claims 13 and 25. Hughes, Hamanaka, Carbonneau, Barton Abdulrahiman, Safadi, Gorman and Phan are cited to allegedly show other features and do not remedy the deficiencies in Pham.


Accordingly, it is respectfully requested that independent claims 13 and 25 be allowed. In addition, it is respectfully submitted that the dependent claims should also be allowed at least based on their dependence from independent claims 13 and 25, as well as for the separately patentable elements contained in each of the claims. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, Applicants reserve the right to submit further arguments in support of

the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

By   
Dicran Halajian, Reg. 39,703  
Attorney(s) for Appellant  
February 23, 2012

**THORNE & HALAJIAN, LLP**  
111 West Main Street  
Bay Shore, NY 11706  
Tel: (631) 665-5139  
Fax: (631) 665-5101